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Attorneys for Defendants
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STEPHEN J. BACK, DON CROSATTO, MARK HOLLIBUSH, JON ROSELLE,
DOUG CORNFORD, JAMES V. CANTERBURY and JOSE SANTANA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SOUTH CITY MOTORS, INC., a Delaware
corporation, CAPITOL EXPRESSWAY FORD,
INC., a Delaware corporation, and FORD MOTOR
COMPANY, a Delaware corporation,

Plaintiffs,
v.

AUTOMOTIVE INDUSTRIES PENSION TRUST
FUND, JAMES H. BENO, Trustee, STEPHEN J.
MACK, Trustee, DON CROSATTO, Trustee,
MARK HOLLIBUSH Trustee, DOUG
CORNFORD, Trustee, JAMES V.
CANTERBURY, Trustee, and JOSE SANTANA,
Trustee,

Defendants.

Case No. 3:15-cv-01068-JST

STIPULATION AND JOINT REQUEST
TO AMEND SCHEDULING ORDER;
~~PROPOSED~~ ORDER

The Court's Scheduling Order of June 28, 2018 (Doc. No. 50) adopted the parties' agreed schedule for this action. That schedule contained an error relating to the timing of dispositive motions, setting a March 15, 2019 filing date, the same date as fact discovery cut-off, and an August 1, 2019 hearing date. The parties have made their initial disclosures and are currently engaged in discovery. They now request that the Court amend the schedule to extend both the fact and expert witness discovery to May 3, 2019, extend the dispositive motion filing date, and set a briefing schedule for cross-motions. The dispositive motion hearing date and all subsequent dates, including the trial date, would remain unchanged.

IT IS HEREBY STIPULATED between the parties, through their respective counsel, and jointly requested by the parties, that the Court amend its Scheduling Order of June 28, 2018 as follows:

Event	Deadline	Requested Amended Deadline
Deadline to file amended complaint	July 18, 2018	No change
Initial disclosures	July 18, 2018	No change
Deadline to file motion to dismiss amended complaint	August 8, 2018	No change
Completion of fact discovery	March 15, 2019	May 3, 2019
Disclosure experts/exchange expert reports	March 22, 2019	March 26, 2019
Rebuttal expert disclosure	April 5, 2019	April 9, 2019
Completion of expert discovery	April 29, 2019	May 3, 2019
Defendants file dispositive motion	March 15, 2019	May 31, 2019
Plaintiffs file opposition and cross-motion		June 14, 2019
Defendants file opposition to cross-motion and reply in support of motion		June 28, 2019
Plaintiffs file reply in support of cross-motion		July 5, 2019
Hearing on dispositive motions	August 1, 2019	No change

Final pretrial conference	October 4, 2019	No change
Trial	October 28, 2019 at 8:00 a.m.	No change

The parties respectfully request that the Court adopt the amendments requested above.

Dated: February 15, 2019

/s/ Joshua J. Cliffe
 JOSHUA J. CLIFFE
 SEAN P. PIERS
 LITTLER MENDELSON, P.C.
 Attorneys for Plaintiffs
 SOUTH CITY MOTORS, INC.,
 CAPITOL EXPRESSWAY FORD, INC.
 and FORD MOTOR COMPANY

Dated: February 15, 2019

/s/ Anne M. Bevington
 ANNE M. BEVINGTON
 MATTHEW P. MINSER
 SALTZMAN & JOHNSON LAW CORPORATION
 Attorneys for Defendants
 AUTOMOTIVE INDUSTRIES
 PENSION TRUST FUND, ET AL.

CERTIFICATION RE SIGNATURES

I attest that concurrence in the filing of this stipulation and joint request has been obtained from each of the other Signatories.

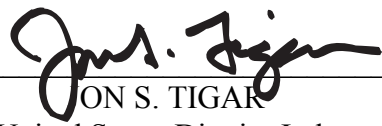
Dated: February 15, 2019.

/s/ Joshua J. Cliffe
 JOSHUA J. CLIFFE

ORDER

Pursuant to the parties' Stipulation and Joint Request, IT IS SO ORDERED.

DATED: February 21, 2019.


 JON S. TIGAR
 United States District Judge